

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

Elizabeth DIONICIO,

Plaintiff,

VS.

Brad ALLISON, Special Agent of
the Tennessee Alcohol & Beverage
Commission, Danielle ELKS, Executive
Director of the Tennessee Alcohol &
Beverage Commission, and Mark
HUTCHENS, Chief Law Enforcement
Officer of the Tennessee Alcohol &
Beverage Commission, all in their
individual and official capacities,

Defendants.

Case No. 3:09-cv-575

Judge Haynes

PLAINTIFF'S MOTION TO COMPEL DISCOVERY FROM A NONPARTY
WHICH IS UNOPPOSED BY DEFENDANTS

Comes now the Plaintiff, by and through her undersigned attorney, and hereby
moves this Court to compel production of certain documents pursuant to a subpoena
duces tecum issued to a federal agent with Immigration and Customs Enforcement
(hereafter, ICE), Jonathan Hendrix, who is assigned to the ICE office in Nashville,
Tennessee. Agent Hendrix was the primary ICE agent that was involved in the joint
operation with the Defendants and the Tennessee Alcoholic Beverage Commission
(hereafter, TABC) that is the subject of this action.

The deadline for discovery completion is December 30, 2009.

EXPEL
This motion
is DENIED as
Plaintiff has received
documents about her
from Immigration and
Customs Enforcement
and the
Plaintiff
has not
overcome
the agency's
assertion
of the enumerated
exemptions
under the
Freedom of
Information
Act.

Will J. [Signature]
6-17-10